

TCR:hcs

AO 91 (Rev. 11/11) Criminal Complaint

2017R00272

## UNITED STATES DISTRICT COURT

for the

District of Minnesota

UNITED STATES OF AMERICA

v.

Case No. 17-MJ-667 BRT

ARON AVRAM SHAMILOV

## CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

COUNT ONE

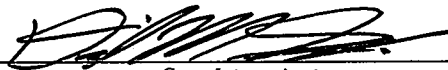
(False Personation - Officer or Employee of the United States)

On or about March 28, 2017, in the District of Minnesota, the defendant, ARON AVRAM SHAMILOV, did falsely assume and pretend to be an officer and employee of the United States acting under the authority thereof, that is a Special Agent of the Federal Bureau of Investigation, and in such assumed and pretended character with intent to defraud did falsely demand a thing of value, in violation of Title 18, United States Code, Section 912.

I further state that I am a Special Agent of the FBI and that this complaint is based on the following facts:

**See Attached Affidavit**

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No



Complainant's signature

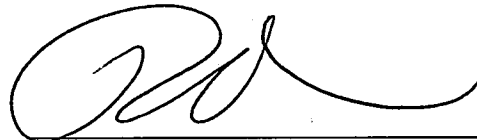
David Goodoien, Special Agent  
Federal Bureau of Investigation

Printed name and title

Sworn to before me and signed in my presence.

Date:

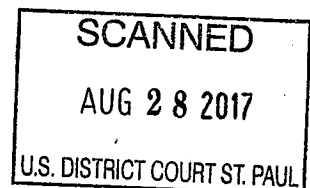
Aug 28, 2017

City and State: St. Paul, MN

Judge's Signature

The Honorable Becky R. Thorson,  
U.S. Magistrate Judge

Printed Name and Title



17-MJ-667 B2+

STATE OF MINNESOTA )  
 )  
COUNTY OF HENNEPIN )

ss. AFFIDAVIT OF DAVID GOODOIEN

I, David Goodoien, being duly sworn, depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. Your Affiant is a Special Agent with the Federal Bureau of Investigation (FBI) and has been so employed since 2016. I have been assigned to the Minneapolis Division of the FBI since completing my training as a new agent. In addition to successfully completing New Agent Training at the FBI Academy in Quantico, Virginia, I have received additional formal and informal training related to Counterintelligence. Prior to joining the FBI, I worked for Target Corporation in cyber security. I became aware of cyber security methods for encrypting information and obfuscating files to hide their true contents. Prior to working at Target, I held a security clearance for four years as a Department of Defense (DOD) contractor and DOD civilian employee.

2. As a Special Agent of the FBI, my duties and responsibilities include conducting investigations of individuals and entities suspected of violating federal law, particularly those laws found in Title 18 and Title 21 of the United States Code (U.S.C.). As an investigator and law enforcement officer of the United States, I am empowered by law to conduct investigations and make arrests for offenses enumerated in Title 18, United States Code Section 2516.

**PURPOSE OF THE AFFIDAVIT**

3. I make this affidavit in support of an application for a criminal complaint and arrest warrant for **ARON AVRAM SHAMILOV** ("SHAMILOV") based on probable

cause to believe that **SHAMILOV** violated Title 18, U.S.C. § 912, False Personation - Officer or Employee of the United States. Specifically, there is probable cause to believe **SHAMILOV** fraudulently impersonated an FBI Special Agent when he presented a letter purportedly authored by a FBI Special Agent to obtain a thing of value.

4. The facts and information contained in this affidavit are based upon my own investigation and observations and those of other agents and law enforcement officers involved in the investigation. All observations referenced below that were not made by me were related to me by the persons who made such observations. This affidavit contains information necessary to support probable cause for the attached application. It is not intended to include each and every fact and matter observed by me or known to the Government.

#### **STATEMENT OF PROBABLE CAUSE**

##### **A. SUMMARY OF THE INVESTIGATION**

5. As described below, on or about March 28 or 30, 2017, **SHAMILOV** falsely impersonated a federal officer when he provided to an apartment leasing office a letter purportedly authored by a Special Agent of the FBI in support of **SHAMILOV**'s attempt to obtain a thing of value from the leasing office, to wit: a residence. The letter provided by **SHAMILOV** falsely states that **SHAMILOV** was a victim of identity theft (See "Letter" at Exhibit 1), which was intended to support the claim made by **SHAMILOV** to the leasing office that his low credit score could be explained by the fact that someone had stolen his identity.

**B. PROBABLE CAUSE**

6. Based on my review of reports prepared by FBI Special Agents and other official records, I know that on May 2, 2017, J.E., the property manager of a Minneapolis, Minnesota, apartment complex called the FBI Minneapolis Division to verify the validity of a letter purportedly authored by an FBI Special Agent and provided to J.E. by **SHAMILOV** in support his application for tenancy. From my review of the letter and the information provided by J.E., I learned the following:

a. The printed letter bears the FBI seal and purports to have been authored by "Special Agent Richard Thornton" of the Minneapolis Division.<sup>1</sup>

b. The letter states that Special Agent Richard Thornton has been assigned to investigate an identity theft case in which **SHAMILOV** was allegedly a victim.

c. When presenting the letter, **SHAMILOV** told J.E. that his own credit history was poor because his identity had been stolen. **SHAMILOV** told J.E. that the FBI was investigating a major Social Security breach and that **SHAMILOV** was a victim.

d. J.E. provided to the FBI the letter given to him by **SHAMILOV** in support of his "identity theft victim" claim. After reviewing the letter, the FBI advised J.E. that the letter was not genuine.

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<sup>1</sup> I know Richard Thornton to be the Special Agent in Charge of the Minneapolis Division of the FBI.

7. On June 20, 2016, I participated in an interview of J.E. From this interview, I learned the following:

a. When seeking to obtain a lease at the property managed by J.E., **SHAMILOV** first interacted with members of J.E.'s staff. **SHAMILOV** advised staff that he previously applied to lease another apartment but his application was denied because of his low credit score. **SHAMILOV** claimed that his low credit score was a consequence of identity theft. **SHAMILOV** claimed to have the paperwork to prove that his identity had been stolen. **SHAMILOV'S** application was then elevated to J.E., the property manager, to determine if **SHAMILOV** was the victim of identity theft and should have his rental application approved in spite of his low credit score.

b. J.E. did not recall the exact date he met with **SHAMILOV**, but believed he did so on either March 28 or 30, 2017. At this meeting, **SHAMILOV** provided to J.E. documents that he claimed proved that his identity was stolen. These documents included the letter purported to be from the FBI; a Federal Trade Commission Identity Theft Report (report number 76871519 that purports to show that **SHAMILOV** was a victim of identity theft); and a St. Louis Park Police Department document with a case number and officer contact information.

c. On March 31, 2017, **SHAMILOV** submitted his lease application for an apartment at the Minneapolis, MN apartment complex managed by J.E. The application was for an 18-month lease of a one bedroom, one bathroom apartment

at a monthly rent of \$1,605. **SHAMILOV** submitted the application online, from Internet Protocol (IP) address 69.162.16.17, which resolves to the MGM Resorts International in Las Vegas, Nevada.

d. On May 2, 2017, J.E. called the FBI to verify the validity of the FBI letter **SHAMILOV** provided. As stated above, J.E. was told that the FBI did not write the letter. J.E. provided the letter and the other documentation to interviewing agents.

e. When shown an unmarked photograph of **SHAMILOV**, J.E. claimed that he was "very sure" that the individual depicted was **SHAMILOV**.


8. On June 20, 2017, I interviewed Richard Thornton, the Special Agent in Charge (SAC) of the Minneapolis Division of the FBI and the FBI Special Agent who purportedly authored the letter provided by **SHAMILOV** to J.E. SAC Thornton advised me that the letter was not written by him. When shown an unmarked photograph of **SHAMILOV** with no identifying information, SAC Thornton stated that he did not know the person in the photograph.

### CONCLUSION


9. Based on the facts set for the above, and based on my training, experience, knowledge, and the aforementioned facts of this investigation, I believe there is probable cause to believe that **ARON AVRAM SHAMILOV** has committed criminal offenses against the United States, including violations of 18 U.S.C. § 912, False Personation -

Officer or Employee of the United States. I, therefore, respectfully request that the attached warrant be issued authorizing the arrest of **ARON AVRAM SHAMILOV**.

FURTHER YOUR AFFIANT SAYETH NAUGHT

  
\_\_\_\_\_  
David Goodoien  
Special Agent  
Federal Bureau of Investigation

Sworn and subscribed to before me this 28<sup>th</sup> day of August, 2017.

  
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The Honorable Becky R. Thorson  
United States Magistrate Judge